UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CONNECTU LLC,

Plaintiff,

Case No.: 04-11923 DPW

v.

MARK ZUCKERBERG, EDUARDO SAVERIN, DUSTIN MOSKOVITZ, ANDREW MCCOLLUM, CHRISTOPHER HUGHES AND THEFACEBOOK, INC.,

Defendants.

MARK ZUCKERBERG, and THEFACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

CAMERON WINKLEVOSS, TYLER WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

ASSENTED-TO MOTION BY ALL DEFENDANTS TO EXTEND TIME
TO RESPOND TO PLAINTIFF'S MOTION TO COMPEL THE
PRODUCTION OF MIRROR IMAGES OF DEFENDANTS' HARD DRIVES
AND OTHER ELECTRONIC
MEMORY DEVICES AND DOCUMENTS CREATED AFTER MAY 21, 2004

Defendants Mark Zuckerberg, Dustin Moskovitz, Andrew McCollum, Christopher Hughes, TheFacebook, Inc., and Eduardo Saverin (collectively the "Defendants"), hereby request

that the time for them to respond to Plaintiff's Motion to Compel the Production of Mirror Images of Defendants' Hard Drives and Other Electronic Memory Devices and Documents Created after May 21, 2004 (the "Motion to Compel") be extended by one (1) week. The Motion to Compel was filed on July 28, 2005, and a response thereto is currently due on August 11, 2005. With the brief extension, which Defendants request to address adequately the arguments set forth in the Motion to Compel and voluminous supporting materials, a response would be due on August 18, 2005.

WHEREFORE, Defendants respectfully request that this Court grant the motion, allowing the Defendants until August 18, 2005 to respond to the Motion to Compel.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies pursuant to D. Mass. Local Rule 7.1(A)(2) that counsel for Defendants conferred with counsel for Plaintiff regarding the filing of this motion, and that counsel for Plaintiff assents to the relief requested.

Respectfully submitted,

MARK ZUCKERBERG, DUSTIN MOSKOVITZ, ANDREW MCCOLLUM, CHRISTOPHER HUGHES, and THE FACEBOOK, INC.,

By their attorneys,

EDUARDO SAVERIN,

By his attorneys,

/s/ Monte Cooper (by DKH)

G. Hopkins Guy, III (pro hac vice)
I. Neel Chatterjee (pro hac vice)
Monte Cooper (pro hac vice)
Joshua H. Walker (pro hac vice)
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road

Menlo Park, CA 94025-1015 Telephone: (650) 614-7400 Facsimile: (650) 614-7401

-and-

Donald Daybell (*pro hac vice*) ORRICK, HERRINGTON & SUTCLIFFE LLP 4 Park Plaza, Suite 1600 Irvine, CA 92614-2558 Telephone: (949) 567-6700 Facsimile: (949) 567-6710

-and-

Steven M. Bauer (BBO# 542531)
Jeremy P. Oczek (BBO #647509)
PROSKAUER ROSE LLP
One International Place
Boston, MA 02110
Telephone: (617) 526-9600
Facsimile: (617) 526-9899
sbauer@proskauer.com
joczek@proskauer.com

Dated: August 10, 2005

3123942_v2

/s/ Daniel K. Hampton

Gordon P. Katz (BBO No. 261080) Daniel K. Hampton (BBO No. 634195) HOLLAND & KNIGHT LLP

10 St. James Avenue Boston, MA 02116

Telephone: (617) 523-2700 Facsimile: (617) 523-6850 gordon.katz@hklaw.com dan.hampton@hklaw.com

-and-

Robert B. Hawk (pro hac vice) Bhanu K. Sadasivan (pro hac vice) HELLER EHRMAN, LLP 275 Middlefield Road Menlo Park, CA 94025 Telephone: (650) 324-7000

Facsimile: (650)324-0638